

(Rev. 10/11/22)

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

DANIEL GRAND,	)	CASE NO. 1:22-cv-1594
	)	
Plaintiff,	)	JUDGE BRIDGET MEEHAN BRENNAN
	)	
v.	)	
	)	
CITY OF UNIVERSITY HEIGHTS,	)	<b>CASE MANAGEMENT ORDER</b>
OHIO, <i>et al.</i> ,	)	
	)	
Defendants.	)	

The Case Management Conference (“CMC”) in this matter was held on January 25, 2023. Attorney Jonathan Gross participated on behalf of Plaintiff. Attorney James Climer participated on behalf of Defendants City of University Heights, Ohio and Michael Brennan. Attorney Cari Evans participated on behalf of Defendant Jeffrey Porter. The Law Director of University Heights, Luke McConville, was also present.

The parties and counsel of record agreed to the following, and **IT IS SO ORDERED** that:

1. This case is assigned to the **complex** track.
2. This case will be referred for Alternative Dispute Resolution (“ADR”):  
Yes \_\_\_\_\_ No \_\_\_\_\_ Decision delayed \_\_\_\_\_X\_\_\_\_\_
3. The parties **do not** consent to the jurisdiction of a United States Magistrate Judge pursuant to 28 U.S.C. § 636(c).
4. The pleadings shall be amended without leave of the Court and new parties shall be joined on or before **May 1, 2023**.

5. Electronically Stored Information. The parties agree to follow the default standard for discovery of electronically stored information (Appendix K to Northern District of Ohio Local Rules). Parties to execute agreement within 30 days.

6. Protective Order. The parties agreed to the proposed form protective order filed on January 16, 2023.

7. Non-expert discovery shall be completed by **October 9, 2023**. Discovery shall be conducted according to the guidelines set forth in Local Rule 16.2 for cases assigned to this track. Parties must comply with Local Rule 37.1 before filing any motions seeking aid from the Court in discovery matters. To satisfy the requirement for meet and confer, the parties must meet in person or by video conference. If a telephonic conference is the only available means, the parties must explain why that is so. Email communications will never be sufficient.

8. Expert discovery shall be completed as follows:

Report(s) for party bearing the burden of proof: **5/1/2023**

Responsive report(s): **6/30/2023**

Expert discovery deadline: **10/9/2023**

9. The dispositive motion deadline is **November 13, 2023**. Responses to dispositive motions must be filed within thirty (30) days of service of the dispositive motion. Replies must be filed within fourteen (14) days of the service of the response. (*See* Local Rule 7.1). No sur-reply brief may be filed without leave from the Court. No request for an extension of time will be entertained unless it is filed prior to the response date from which extension is sought and it indicates whether opposing counsel consents or objects to the requested extension.

10. A telephonic status conference with lead counsel is set for **May 1, 2023, at 8:30 a.m.** Counsel shall confer within five (5) business days of the scheduled conference to discuss

outstanding issues and respective positions as to settlement. Counsel shall provide to the Court within three (3) business days of the conference, a joint Status Report or confidential individual Status Reports describing the status of discovery, settlement positions, and issues to be addressed. The Status Reports need not be filed, but may be delivered via email to Brennan\_Chambers@ohnd.uscourts.gov.

**IT IS SO ORDERED.**

Date: January 25, 2023

A handwritten signature in black ink, appearing to read "Bridget M. Brennan", written over a horizontal line.

BRIDGET MEEHAN BRENNAN  
UNITED STATES DISTRICT JUDGE